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*Counsel for Defendant Google LLC*

**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

CHASOM BROWN, WILLIAM BYATT,  
JEREMY DAVIS, CHRISTOPHER  
CASTILLO, and MONIQUE TRUJILLO,  
individually and on behalf of themselves and  
all others similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**DECLARATION OF MARIE  
HAYRAPETIAN IN SUPPORT OF JOINT  
SUBMISSION RE: SEALING PORTIONS  
OF THE MARCH 17, 2022 HEARING  
TRANSCRIPT**

Judge: Hon. Susan van Keulen, USMJ

1 I, Marie Hayrapetian, declare as follows:

2 1. I am a member of the bar of the State of California and an attorney with Quinn  
3 Emanuel Urquhart & Sullivan, LLP, attorneys for Defendant, Google LLC (“Google”) in this action.  
4 I make this declaration of my own personal, firsthand knowledge, and if called and sworn as a  
5 witness, I could and would testify competently thereto.

6 2. Pursuant to Civil Local Rule 79-5, I submit this declaration in support of the Joint  
7 Submission Re: Sealing Portions of the March 17, 2022 Hearing Transcript. In making this request,  
8 Google has carefully considered the relevant legal standard and policy considerations outlined in  
9 Civil Local Rule 79-5. Google makes this request with the good faith belief that certain information  
10 sought to be sealed consists of Google’s confidential information and that public disclosure could  
11 cause competitive harm.

12 3. Google respectfully requests that the Court seal the redacted portions of the March  
13 17, 2022 Hearing Transcript (“Transcript”).

14 4. The information requested to be sealed contains Google’s non-public, sensitive  
15 confidential and proprietary business information that could affect Google’s competitive standing  
16 and may expose Google to increased security risks if publicly disclosed, including details related to  
17 Google’s internal systems, projects, identifiers, and their proprietary functions, which Google  
18 maintains as confidential in the ordinary course of its business and is not generally known to the  
19 public or Google’s competitors.

20 5. Such highly confidential information reveals Google’s internal strategy and systems  
21 regarding various important products and nonpublic investigations thereto and falls within the  
22 protected scope of the Protective Order entered in this action. *See* Dkt. 81 at 2-3. The redacted  
23 portions also contain, summarize or reflect material designated, Confidential or Highly Confidential  
24 – Attorneys’ Eyes Only Pursuant to Stipulated Protective Order.

25 6. Public disclosure of such highly confidential information could affect Google’s  
26 competitive standing as competitors may alter their system designs and practices relating to  
27 competing products, time strategic litigation, focus their patent prosecution strategies, or otherwise  
28 unfairly compete with Google. It may also place Google at an increased risk of cybersecurity threats,

1 as third parties may seek to use the information to compromise Google's internal systems and  
2 operations.

3 7. On May 19, 2022, the parties conferred on the proposed redactions to the Transcript.  
4 Plaintiffs take no position on sealing Google's proposed redactions. Google takes no position on  
5 sealing Plaintiffs' proposed redactions.

6 8. For these reasons, Google respectfully requests that the Court order the identified  
7 portions of Transcript to be sealed.

8 I declare under penalty of perjury of the laws of the United States that the foregoing is true  
9 and correct. Executed in Los Angeles, California on May 19, 2022.

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11 DATED: May 19, 2022

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

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14 By /s/ Marie Hayrapetian  
15 Marie Hayrapetian  
16 Attorney for Defendant  
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